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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

18 RICHARDO ANGEL NAVARRETTE and
KELLY KASLAR,

CASE NO. C 04-0760 JSW

19 || Plaintiffs,

20 || v.

21 || UNITED STATES OF AMERICA.

**STIPULATION AND JOINT MOTION
TO EXTEND DEADLINE FOR
COMPLETION OF MEDIATION;
[PROPOSED] ORDER**

23 || Defendant.

25 Subject to this Court's approval, plaintiff, Ricardo Angel Navarrete, and defendant, the
26 United States of America, by and through their undersigned counsel, hereby stipulate and agree to
27 continue the deadline for completion of court-connected mediation to March 6, 2009. This Federal
28 Tort Claims Act case is currently set for bench trial beginning on April 27, 2009. The pre-trial

1 conference will take place on April 6, 2009. This request will cause no change to the pre-trial
2 conference date or the trial date.

3 The parties have completed factual discovery. The additional time is necessary to allow the
4 parties to complete expert witness depositions. As currently scheduled, the last expert deposition in
5 this matter is scheduled for February 27, 2009. In the absence of all expert testimony, the parties
6 agree they lack sufficient information to engage in a meaningful mediation session. The parties
7 conferred with the mediator, Christopher Johns, and scheduled a mediation session for March 6,
8 2009.

9 The parties therefore jointly request that the Court extend the deadline for the completion of
10 court-connected mediation from February 27, 2009 until March 6, 2009.

11 **IT IS SO STIPULATED.**

12 Dated: February 2, 2009

13 Respectfully submitted,

14 JOSEPH RUSSONIELLO
15 United States Attorney

16 By: _____/s/
17 ELLEN M. FITZGERALD
18 Assistant United States Attorney
Attorney for Defendant

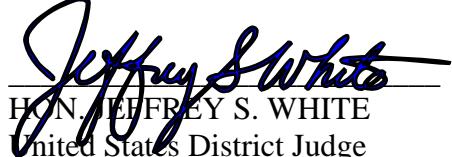
19 BOZMAN-MOSS & WATSON

20 By: _____/s/
21 BARBARA BOZMAN-MOSS
22 Attorney for Plaintiff

23 **APPROVED AND SO ORDERED.**

24 The Court hereby extends the deadline for court-connected mediation until March 6, 2009.
25 All other dates remain the same.

26 Dated: February 3, 2009


27 HON. JEFFREY S. WHITE
28 United States District Judge